
To: Cindy Walden
Subject: RE: 1802 comments

From: Mitch [mailto:mitchmmmm@hotmail.com]
Sent: Saturday, July 09, 2011 10:33 AM
To: Cindy Walden; Michael Milnes
Cc: Kevin McCarty; Jeff Atwater
Subject: Notice of Proposed Rulemaking for OIR-B1-1802 UMVIF Form Update/Changes/Clarifications (Corrected Copy)
Importance: High

(Corrected Copy of 8 Jul message, due to formatting and other errors. Please disregard previous message)

Office of Insurance Regulation

Mike and Cindy,

Please consider the following or below proposed final changes to the HIP Roof definition and other recommended changes, in your review and update of the 1802 Form. The HIP Roof definition proposed below is inline with the ARA 2008 and 2010 Studies and Recommendations, which retained the current HIP Roof definition with some proposed changes. I have added additional clarifications and more precise measurement instructions that should result in much more uniform measurements of the two primary factors that determine the Non-HIP Roof percentage, which is critical! The proposed definition should also allow and encourage aerial verification of Roof Perimeters, if a dispute occurs over the measurement! This more precise and detailed definition should significantly reduce the number of disputes between Policy Holders, Insurance Underwriters, and Inspectors (if required) which should be the goal! This and other 1802 Form definitions that are key to determining the validity of allowed Insurance Credits must be detailed and accurate enough to avoid disputes, or even the use of Inspectors if the Credit can be verified easily by all! I agree with the ARA Reports suggestion that the HIP Roof key factors that are measured should be noted on the Inspection Form, which is in addition to checking the HIP box if it is applicable! This addition is needed even though the Inspector has been and should continue to include his detailed measurements on a separate sheet or sketch in his Inspection Report along with any required pictures taken!

I disagree with the stronger language added that attempts to try to hold the Inspector and/or Home Owner/Policyholder more or mostly responsible or accountable for the Report's content/validity/accuracy, as this would not be necessary or an issue if all 1802 definitions were less vague and more precise and not subject to disputes over their meaning or how a valid credit is confirmed! Most such disputes are just measurement errors or misinterpretations of vague instructions listed as definitions!

I strongly object to the added Note at the end of the Inspection Form " for underwriting purposes, your insurer may ask additional questions regarding your mitigated feature/s" This new Note is an Open invitation to Insurance Underwriters to continually question or improperly interfere with the results of any and all Insurance Credits already verified by Paid for state licensed and qualified Inspectors! If they additionally want to continue to question someone about properly approved Credits, it should first be the Paid for and qualified Inspector with the policy holders permission and concurrence and with the policy holder kept fully informed of any disputes or changes made by the Inspector! Policy holders do not need expensive independent Inspections to be performed, along with giving the Insurance Companies more rights or additional incentives to question the policy holder about Inspection results they paid a Professional to do just because they do not like the results! This is the responsibility of the paid for Inspector to answer or resolve, with the concurrence of the policy holder! Please remove this note from the Inspection Form, or clarify its purpose and wording!

Request that a new note be added after each "...valid for (5) years after verification...": Note: This verification remains valid for (5) years after verification, if any definition for a Credit item is completely changed prior to the end of the 5 years!

Thank you very much for posting these proposed and recommended changes to your 1802 Form site, if approved I believe they will improve its accuracy and ease of use by Inspectors and lead to fewer disputes, if adopted during your review!

Thank you for all your previous assistance, and if you have any questions please ask! The ARA 2008 and 2010 Reports were quite comprehensive on insurance risks and mitigation factors and could be of significant help to Insurance companies in their rating process, even though they were written for your Office!

Mitchell

OIR Proposed Change for 1802 Form, Both OIR Form's 1 & 2 , Item 5 Roof Geometry:

5. Roof Geometry : What is the roof shape(s)? (Porches or carports that are attached only to the fascia or wall of the host structure and not structurally connected to the main roof system are not considered in the roof geometry determination.)

A. Hip Roof: Hip roof and has no gable end that exceeds 50% of a major wall length. Hip roof with no other roof shapes greater than 10% of the total building perimeter.

B. Non-Hip Roof: Any other roof shape or combination of roof shapes including hip, gable, gambrel, mansard and other roof shapes not including flat roofs.

C. Flat Roof: Flat roof shape in which 90% of the total roof area has a slope of less than 2:12. Flat roof shape greater than 100 square feet or 10% of the entire roof, whichever is greater.

Proposed New/Revised 1802 Form, Item 5 Roof Geometry, Based on the ARA 2008 and 2010 Studies/Reports and their Recommendations:

5. Roof Geometry: What is the Predominant Roof Shape? Porches or carports that are attached only to the fascia or wall of the host structure and not structurally connected to the main roof system are not considered in the roof geometry determination.

A. HIP Roof: HIP Roof with no other roof shapes (Gable, etc) greater than 10% of the total Roof Perimeter (Measured at the lower edge of the Home's Roof line, in order to facilitate verification by Satellite/Aerial pictures and official Plats/Surveys). Note: Any Other Roof Shape length is measured at the same Perimeter edge of the roof or the same level where the HIP roof meets the wall. Any other portion of the Other Roof shape (including Gable) not at this roof line level or that is offset/overlapping part of the HIP roof is considered part of the Predominant HIP Roof and not included in this measurement. One exception is allowed for a Dutch HIP Roof Other Roof measurement, where the base of each vertical triangular face (similar to a Gable Face) is measured as if it were resting on the exterior wall or roof line even though it is set back from the wall or roof line.

Total Length of HIP Roof Perimeter: _____Feet Total Length of Non-HIP Roof Section (s) per above instructions in Note: _____Feet Non-HIP Roof: _____Percentage

B. Non-HIP Roof: Any other roof shape or combination of roof shapes including hip, gable, gambrel, mansard and other roof shapes, not including flat roofs.

C. Flat Roof: Flat roof shape in which 90% of the total roof area has a slope of less than 2:12.

End of 1802 Proposed Changes

Mitchell

Policy Holder

To: Cindy Walden
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“ Recommend the two proposed Form examples (Form #1 & Form #2) posted on your OIR 1802 site be changed and updated to reflect the current HIP Roof definition or the one with up to 10% Other or Gable Roof! I realize this event may result in a delay or more comment time for the 1802 proposed revisions, but I believe it is necessary to ensure the accuracy of the revised Form and to allow other interested parties to submit corrected or changed comments if they so choose! Also, I believe any discount Credits earned or previously earned are unrelated to the 2002 Report and its HIP definition, as it was just a suggested definition in that Report and a poorly written one! If you have any questions, please contact me by email! I hope to be able to submit additional mainly HIP Roof comments by the 8 Jul deadline, but additional time is preferred if possible. “

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